

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

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UNITED STATES STEEL CORPORATION,	:	
NIPPON STEEL CORPORATION, and NIPPON	:	Civil Action No.: 2:25-cv-15
STEEL NORTH AMERICA, INC.	:	
	:	
Plaintiffs,	:	
	:	
vs.	:	
	:	
CLEVELAND-CLIFFS INC., LOURENCO	:	
GONCALVES, and DAVID McCALL	:	
	:	
Defendants.	:	
-----		X

MOTION FOR ADMISSION PRO HAC VICE OF ANDREW S. TODRES

Andrew S. Todres, undersigned counsel for Plaintiffs Nippon Steel Corporation and Nippon Steel North America, Inc., hereby moves that Andrew S. Todres be admitted to appear and practice in this Court in the above-captioned matter as counsel pro hac vice for Plaintiffs Nippon Steel Corporation and Nippon Steel North America, Inc. in the above-captioned matter pursuant to LCvR 83.2, LCvR 83.3, and this Court's Standing Order Regarding Pro Hac Vice Admissions dated May 31, 2006 (Misc. No. 06-151).

In support of this motion, undersigned counsel attaches the Affidavit for Admission Pro Hac Vice of Andrew S. Todres filed herewith, which, it is averred, satisfies the requirements of the foregoing Local Rules and Standing Order.

Respectfully submitted

Dated: January 6, 2025

/s/ Andrew S. Todres

Andrew S. Todres
N.Y. Bar No. 5347521
Ropes & Gray LLP
1211 Avenue of the Americas
New York, NY 10036-8704
Tel: (212) 596-9000
Fax: (212) 596-9090
andrew.todres@ropesgray.com

*Of Counsel for Plaintiffs Nippon Steel
Corporation and Nippon Steel North America,
Inc.*

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Plaintiffs,	:
	:
vs.	:
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CLEVELAND-CLIFFS INC., LOURENCO	:
GONCALVES, and DAVID McCALL	:
	:
Defendants.	:
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**AFFIDAVIT OF ANDREW S. TODRES IN SUPPORT OF MOTION
FOR ADMISSION PRO HAC VICE**

I, Andrew S. Todres, make this affidavit in support of the motion for my admission to appear and practice in this Court in the above-captioned matter as counsel pro hac vice for Plaintiffs Nippon Steel Corporation and Nippon Steel North America, Inc. in the above-captioned matter pursuant to LCvR 83.2, LCvR 83.3, and this Court's Standing Order Regarding Pro Hac Vice Admissions dated May 31, 2006 (Misc. No. 06-151).

I, Andrew S. Todres, being duly sworn, do hereby depose and say as follows:

1. I am a Partner of the law firm of Ropes & Gray LLP.
2. My business address is 1211 Avenue of the Americas, New York, NY 10036-8704.
3. I am a member in good standing of the bars of New York, the U.S. Court of Appeals for the District of Columbia Circuit, the U.S. District Court for the Southern District of New York, and the U.S. District Court for the Eastern District of New York.

4. My bar identification numbers are 5347521 (New York) and 65565 (U.S. Court of Appeals for the District of Columbia Circuit).

5. A current certificate of good standing from New York is attached to this Affidavit as Exhibit A.

6. I attest that I am a registered user of ECF in the United States District Court for the Western District of Pennsylvania.

7. I attest that I have read, know, and understand the Local Rules of Court for the United States District Court for the Western District of Pennsylvania.

8. Based upon the foregoing, I respectfully request that I be granted pro hac vice admission in this matter.

I certify and attest that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are false, I am subject to punishment.

Respectfully submitted

Dated: January 6, 2025

/s/ Andrew S. Todres

Andrew S. Todres

EXHIBIT A



*Appellate Division of the Supreme Court
of the State of New York
First Judicial Department*

I, Susanna M. Rojas, Clerk of the Appellate Division of the Supreme Court of the State of New York, First Judicial Department, do hereby certify that

Andrew Simon Todres

was duly licensed and admitted to practice as an Attorney and Counselor at Law in all the courts of this State on April 20, 2015, has duly taken and subscribed the oath of office prescribed by law, has been enrolled in the Roll of Attorneys and Counselors at Law on file in this office, is duly registered with the Office of Court Administration, and according to the records of this Court is currently in good standing as an Attorney and Counselor-at-Law.

*In Witness Whereof, I have hereunto set
my hand in the City of New York on
December 12, 2024.*



Susanna M. Rojas

Clerk of the Court



Supreme Court of the State of New York
Appellate Division, First Department

DIANNE T. RENWICK
PRESIDING JUSTICE

SUSANNA MOLINA ROJAS
CLERK OF THE COURT

MARGARET SOWAH
DEPUTY CLERK OF THE COURT

DOUGLAS C. SULLIVAN
DEPUTY CLERK OF THE COURT

To Whom It May Concern

An attorney admitted to practice by this Court may request a certificate of good standing, which is the only official document this Court issues certifying to an attorney's admission and good standing.

An attorney's registration status, date of admission and disciplinary history may be viewed through the attorney search feature on [the website of the Unified Court System](#).

New York State does not register attorneys as active or inactive.

An attorney may request a disciplinary history letter from the [Attorney Grievance Committee of the First Judicial Department](#).

Bar examination history is available from the [New York State Board of Law Examiners](#).

Instructions, forms and links are available on [this Court's website](#).

Susanna Rojas
Clerk of the Court

Revised October 2020

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GONCALVES, and DAVID McCALL	:
	:
Defendants.	:
-----X	

PROPOSED ORDER

AND NOW, to wit, this _____ day of January, 2025, upon consideration of the Motion for Admission *Pro Hac Vice* of Andrew S. Todres, it is hereby ORDERED that said Motion be and hereby is GRANTED and Andrew S. Todres is hereby admitted to this Court *pro hac vice* for the purpose of representing Plaintiffs Nippon Steel Corporation and Nippon Steel North America, Inc. in the above-captioned actions.

BY THE COURT:
